UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA:

Respondent/Plaintiff : 7:13-cr-00513-CS-1

Melanie Ferreira :

Petitioner/Defendant : Presented by Affidavit

In Propia Personna :

Verified

NEW DISCOVERY FROM THE GOVERNMENT IN SUPPORT OF DEFENDANT'S MOTION FOR ENLARGEMENT OF TRIAL DUE TO LATE DISCOVERY

Comes now defendant/petitioner, a living breathing woman, without effective assistance of counsel and hereby files this Motion for enlargement of time for trial due to **new** discovery just received by the government yesterday, January 15, 2014, 6 days before the scheduled trial date of January 21, 2014.

On January 15, 2014 Defendant received additional documents regarding discovery at 4:34 PM, See Exhibit A, and another set of documents regarding discovery at 3:11 PM, See Exhibit B, and another set of documents at 12:08 PM, See Exhibit C.

On January 9, 2014 Defendant received 124 pages of discovery from the government in this case.

On December 20, 2013 Defendant received 227 pages of discovery from the government in this case.

The government stated in the December 2, 2013 hearing that all discoveries had been presented to the Defendant. The government is again obviously lying and committing perjury.

Trial is currently scheduled for January 21, 2014.

Defendant again moves the court for postponement of the trial for 90 days to

allow defendant to review the late discovery recently submitted by the government.

See Securities and Exchange Commission v. Pentagon Capital Management, PLS, second circuit 2013, Docket 12-1680, Decided 8/8/13.

Defendant has not had an opportunity to review the discovery presented by the government and she has concentrated on getting other responses in and focusing on newly discovered material that would prove the defendant's innocence.

Defendant **again** moves for a 90-day continuance of trial in order to review the late discovery and prepare any motions necessary.

JURAT

Under penalty of perjury, pursuant to 28 USC section 1746, I declare that I have reviewed the motion presented herein, and that all facts are true and correct.

Dated: 201-16, 2114

Melanie elizabeth: ferreira

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a true and correct copy of the foregoing was served on

uncertify that on this

Honorable Kathy Seibel 300 Quarropas Street White Plains, NY 10601

U.S. Attorney for the Southern District of NY Jason P.W. Halperin 300 Quarropas Street
White Plains, NY 10601

ing counsel and the following parties.

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EXHIBIT A

From: "Giordano, Susan (USANYS)" <Susan.Giordano@usdoj.gov>

Subject: Additional Discovery

Date: January 15, 2014 4:34:42 PM EST

To: "mferreira8@optonline.net" <mferreira8@optonline.net>

©: "margaretshalley@aol.com" <margaretshalley@aol.com>, "Cohen, Marcia (USANYS)" <Marcia.Cohen@usdoj.gov>, "Halperin, Jason (USANYS)" <Jason.Halperin@usdoj.gov>

1 Attachment, 133 KB

Dear Ms. Ferreira:

Attached please find records from Ulster Bank marked 11804 through 11808 received by the Government today. Thank you.

Regards, Susan Giordano Paralegal

add Ulster B...pdf (133 KB)

EXHIBIT B

Additional Documents

"Giordano, Susan (USANYS)" <Susan.Giordano@usdoj.gov>

January 15, 2014 3:11:34 PM EST

"mferreira8@optonline.net" <mferreira8@optonline.net>
"margaretshalley@aol.com" <margaretshalley@aol.com>, "Cohen, Marcia (USANYS)" <Marcia.Cohen@usdoj.gov>, "Halperin, Jason (USANYS)" < Jason. Halperin@usdoj.gov>

1 Attachment, 222 KB

Dear Ms. Ferreira:

Attached are records the Government received today from Wilton Bank marked 11801 through 11803. Thank you.

Regards, Susan Giordano Paralegal

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NORMANCH Jdf (222 KB)

EXHIBIT C

From: "Giordano, Susan (USANYS)" <Susan.Giordano@usdoj.gov>

Subject: US v Melanie Ferreira - Additional documents

Date: January 15, 2014 12:08:49 PM EST

To: "mferreira8@optonline.net" <mferreira8@optonline.net>
Co: "margaretshalley@aol.com" <margaretshalley@aol.com>, "Halperin, Jason (USANYS)" <Jason.Halperin@usdoj.gov>, "Cohen, Marcia (USANYS)" <Marcia.Cohen@usdoj.gov>

2 Attachments, 286 KB

Dear Ms. Ferreira:

Attached please find documents recently received by the Government marked 11794 through 11800. Thank you.

Regards, Susan Giordano Paralegal

Wilton Bk docs.pdf (78.8 KB)Nebraska DMV.pdf (207 KB)